

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

**IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCT LIABILITY LITIGATION MDL No. 2327**

**Memorandum of Law in Support of
Plaintiffs' Motion to Transfer**

Plaintiffs, listed in Exhibit "A" attached hereto, are represented by Kline & Specter, P.C. and hereby respectfully request that their cases be transferred to the District Court for the Eastern District of Pennsylvania (hereinafter "E.D.Pa.") for all further proceedings and trial.

A. Background and Procedural History

Plaintiffs, who have been implanted with pelvic mesh products manufactured and sold by Defendant Ethicon, Inc., Ethicon LLC and/or Johnson & Johnson (hereinafter collectively "Ethicon") have either filed their cases directly in to MDL No. 2327 or have been transferred to MDL No. 2326 pursuant to Conditional Transfer Order from the E.D.Pa. In their Short Form Complaints, Plaintiffs have indicated that the E.D.Pa. is the District Court and Division in which venue would be proper absent direct filing.

Generic discovery is substantially completed. Given the large backlog of cases, and their delay in resolution, Plaintiffs respectfully request that their cases be transferred to the E.D.Pa. for trial. Despite several months of negotiations with counsel for Ethicon, the parties have been unable to settle Kline & Specter, P.C.'s inventory. In addition, Kline & Specter, P.C. has recently tried to verdict two (2) cases in The Philadelphia Court of Common Pleas demonstrating our firms' ability to handle the demands of transfer back to the District Court.

B. Legal Argument

Pretrial Order #12, entered on August 22, 2012, pertains to Master and Short Form Complaint, Master Responsive Pleadings and Direct Filing. (See Exhibit "B.") It was entered, "[T]o eliminate the delays associated with the transfer of cases filed in or removed from other federal district courts to this court as part of MDL No. 2327, to promote efficiency and to accommodate plaintiffs who wish to bring claims against defendants in more than one pelvic repair system MDL"

As stated above, some of Plaintiffs' cases were filed directly in to MDL 2327 and some were transferred to MDL 2326 from the E.D.Pa. For all of the cases, Short Form Complaints have designated the E.D.Pa. as the District Court and Division in which venue would be proper absent direct filing. Per 28 U.S.C. §1391(b)(1) and (d), venue is proper as to Ethicon since those companies have sufficient contacts to subject them to personal jurisdiction in the district.

Pretrial Order #12 contains specific instructions as to cases filed directly in to MDL 2327 and cases transferred in. For cases filed directly in, Pretrial Order #12 makes clear that this MDL is solely for purposes of consolidated discovery and related pretrial proceedings.

(B)(4) This court shall not be deemed to be the "transferor court" simply by virtue of the action having been directly filed into MDL No. 2327. The direct filing of actions in MDL No. 2327 in the Southern District of West Virginia is solely for the purposes of consolidated discovery and related pretrial proceedings as provided by 28 U.S.C. §1407 and, the parties submit to this court's personal jurisdiction and venue in the Southern District for those purposes only. Upon completion of all pretrial proceedings applicable to a case directly filed in the Southern District, the defendants do not intend to waive their rights to transfer any case in this MDL to a court of proper venue under 28 U.S.C. §1406(a). At the conclusion of all pretrial proceedings, the court, pursuant to 28 U.S.C. §1404(a), will transfer each case filed directly in the Southern District to a federal district court of proper venue as defined in 28 U.S.C. §1391, based on the recommendations of the parties to that case, or on its own determination after briefing from the parties if they cannot agree. . . .

(Pretrial Order #12, at (B) (4).))

Regarding cases transferred to MDL 2326 by Conditional Transfer Order of the Judicial Panel on Multidistrict Litigation (hereinafter "MDL Panel"), Pretrial Order #12 provides as follows:

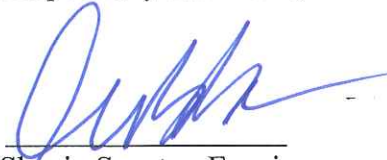
Upon completion of the pretrial proceedings relating to a civil action as determined by this court, civil actions in this MDL which were transferred to this court by the MDL Panel shall be transferred for further proceedings to the District Court from which such action was transferred to this MDL.
(Pretrial Order #12, at (C)(2).)

C. Conclusion

Pretrial proceedings are substantially complete. Plaintiffs' cases are not scheduled for trial in this MDL.¹ Given the large case inventory and the unlikelihood of a prompt adjudication of their claims, Plaintiffs respectfully suggest that transfer is proper at this time and request that their cases be transferred to the E.D.Pa for all further proceedings and trial.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant this motion and transfer all cases listed in Exhibit "A" to the United States District Court for the Eastern District of Pennsylvania.

Respectfully submitted,

By: 
Shanin Specter, Esquire
Lee B. Balefsky, Esquire
Michelle L. Tiger, Esquire
1525 Locust Street, 19th Floor
Philadelphia, PA 19102
(215) 772-1000

Counsel for Plaintiffs

Dated: March 1, 2016

¹ Kline & Specter, P.C. as filed a Motion to Reconsider the Courts denial of our Motion to Withdraw as Counsel in the case of Bellito-Stanford v Ethicon CA 2:12-cv-01124

Exhibit “A”

	A	B	C	D
1	Abbott, Barbara Ann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00352
2	Abt, Angela	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04375
3	Acuff, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29175
4	Adams, Angela	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28547
5	Ahner, Jacqueline	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-09790
6	Albertsen, Mona	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22566
7	Alpha, Sheila	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08107
8	Altman, Victoria	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-cv-13299
9	Anderson, Sharyne Sue	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11910
10	Andrews, Teresa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07112
11	Andryscik, Karen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22681
12	Armontrout, Sarah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31257
13	Auer, Rebecca	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22682
14	Austin, Dana	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22683
15	Baca, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28542
16	Bagner, Mable	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-00930
17	Bailey, Nancy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07095
18	Balura, Cathy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-07854
19	Barber, Leann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12749
20	Barnes, Hazel	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13306
21	Barnett, Rhonda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22684
22	Barney, Brenda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-09184
23	Bayer, Carol	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28503
24	Beadle, Maude	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00517
25	Bell, Janet	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04360
26	Belser, Jaime	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03032
27	Benton, Monica	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-11912
28	Bernard, Elva	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-02932
29	Binks, Tammy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-09785
30	Blake, Kathy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08687
31	Blanchard, Sharon	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04399
32	Block, Jan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00495
33	Bloomfield, Vera	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25040
34	Boulette, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07247
35	Bourque, Marilyn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13661
36	Boyd, Ginger	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08312
37	Brandon, Veronica	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-27464
38	Brewton-Smith, Regina Y.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22776
39	Brindle, Sherry	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05939
40	Brooks, Cindy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22692
41	Brough, Kimberly	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-00905
42	Brown, Charlotte	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05837
43	Brown, Joan A.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11659
44	Brown, Kenyetta	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23270
45	Brown, Loretta	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07520
46	Bucci, Maryann	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:16-00022

	A	B	C	D
47	Burlingame, Emily M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07252
48	Cagle, Terrill	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01768
49	Caldera, Rosa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10649
50	Campbell, Candy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08262
51	Campbell, Joan	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28490
52	Campbell, Kristina	West Virginia Southern District U.S.D.C.	Ethicon	No. 2;13-31261
53	Campbell, Sammy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08095
54	Cannon, Gail	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29621
55	Cannon, Susan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08109
56	Capes, Serita F.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06571
57	Carder, Dolores	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22693
58	Carey, Rita V.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11909
59	Carter, Bessie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28523
60	Carter, Betty	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02877
61	Carter, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01205
62	Carter-Corn, Pamela	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05941
63	Carver, Virginia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-05122
64	Castro, Lenor	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29620
65	Caughill, Michelle	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25266
66	Cerenzio, Linda Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06857
67	Cessna, Phyllis	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05211
68	Chapman, Cheryl	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12763
69	Chester, Susie, dec'd	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28544
70	Christie, Rita	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02880
71	Clark, Carol	West Virginia Southern District U.S.D.C.	Ethicon	NO 2:16-00309
72	Clarkson, Jean	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13296
73	Cleary, Maureen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12759
74	Clemons, Debra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02655
75	Close, Cynthia M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-05940
76	Collings, Erin	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05204
77	Couder, Judith Acosta	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00447
78	Cuckler, Deanna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03036
79	Cuevas, Martha	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22564
80	Cunningham, Sherrilene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25155
81	Danoff, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13660
82	Darga, Jessica	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28511
83	Davis, Mortisha	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-08076
84	Davis, Peggy A.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-29146
85	Delsart, Cindy	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-03827
86	DeMontoya, Rose	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28379
87	DePatra, Annemarie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22703
88	Dill, Mary Elizabeth	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03304
89	Dillon, Debra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25624
90	Dixon, Rebie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00706
91	Dombroski, Cheryl	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-30883
92	Douvier, Laura	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05608

	A	B	C	D
93	Dozier, Jeanette	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15--04394
94	Dunn, Peggy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29133
95	Duvall, Lisa	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04277
96	Dwyer, Deryn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25026
97	Dyrseth, Noni	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07256
98	Eads, Danitta L.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03284
99	Elliott, Michlene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-09178
100	Elquesny, Pilar	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13288
101	Endicott, Dana	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02656
102	Erwin, Kathryn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00703
103	Escobar, Sakina	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-29023
104	Estrada, Dora	West Virginia Southern District U.S.D.C.	Ethicon	No. 2;13-25625
105	Evans, Wanda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25626
106	Fairchild, Bonnie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13112
107	Fancil, Lydia	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04367
108	Farrell, Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13305
109	Fedora, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25627
110	Ferda, Cheryl	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12758
111	Ferla, Nicola	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13303
112	Fernandez, Marta Beatriz	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12757
113	Fifarek, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22694
114	Fincher, Rosalie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25628
115	Finnie-McGhee, D. Anne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25633
116	Fisher, Beth	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25631
117	Foley, Carolyn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01064
118	Foley, Patricia, dec'd	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10600
119	Forlines, Catherine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13119
120	Forquer, Jessica	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02487
121	Forrest, Lisa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10033
122	Fountain, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03736
123	Fowler, Corliss R.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11996
124	Fox, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2;15-07116
125	Franko, Natalie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05840
126	Gallagher, Michell L.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28368
127	Gardner, Jennifer	West Virginia Southern District U.S.D.C.	Ethicon	No. 2-13-03724
128	Garrett, Melanie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-09075
129	Gatsoulas, Elaine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06225
130	Gaughan, Sheryl	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-14349
131	Gerbino, Laurie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28538
132	Gillespie, Jessica	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04404
133	Goldin, Dorothy M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07773
134	Gonzalez-Torres, Maria Crist	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01272
135	Gordon, Linda	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05600
136	Goulette, Laurine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01776
137	Graddy, Shawna M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00693
138	Graham, Cynthia M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07767

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139	Graham, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00505
140	Granillo, Monica	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-06575
141	Grant-Hill, Paula	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03319
142	Green, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-26358
143	Griffin, Karen Rhodes	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08313
144	Grimme, Kathleen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29556
145	Group, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28540
146	Grubbs, Gloria	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04275
147	Guyette, Shelley	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00702
148	Haizlip, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03306
149	Hales, Marquettea	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-27185
150	Hall, Dale	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13118
151	Hall, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-02931
152	Hall, Lisa G.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03277
153	Hall, Rhonda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13116
154	Hammond, Janet	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-29158
155	Hanna, Karen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06214
156	Harhart, Linda	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-29124
157	Harris, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-13664
158	Harris, Elisabeth	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-29782
159	Harris-Smith, Lisa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31329
160	Haviland, Ladonna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-29779
161	Heffelfinger, Cynthia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01776
162	Helm, Nancy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03039
163	Hembree, Judy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01597
164	Hewitt, Kathleen M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07766
165	Hileman, Rena	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03049
166	Hill, Constance	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03279
167	Hoernis, Kelly	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-17183
168	Hoffman, Christine R.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-28084
169	Holt, Sharon	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08686
170	Hoover, Chari	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07107
171	Houillon, Jennifer	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10030
172	Howell, Jeanie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-28083
173	Hoy, Lilyan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08089
174	Hults, Kelli	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-25262
175	Hunter, Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05847
176	Illjes, Lori Ann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05910
177	Inners, Connie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-28346
178	Ivy, Bernice	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07768
179	Izes, Jeannette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13673
180	Izguerra, Lilia Valadez	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13289
181	Jacobson, Naomi	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-29128
182	Jennings, Tammy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-11091
183	Jens, Frances	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05599
184	Jewell, Jackie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03033

	A	B	C	D
185	Johns, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-11196
186	Johnson, Jill	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-28793
187	Johnson, Kathi	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13283
188	Johnson, Tamala	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01677
189	Jones, Evelyn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00701
190	Jones, Hilda M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07246
191	Jones, Judy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-29013
192	Jones, Sandra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03307
193	Jones-Smalley, Merlin	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-29101
194	Joss, Jeanette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11658
195	Jung, Wendy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03317
196	Kasee, Susanne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-07851
197	Kessler, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01211
198	Kimble, Debra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-09555
199	Kinard, Christine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29115
200	King, Joy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11665
201	Kingsbury, Margaret	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-28794
202	Kirby, Marla	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-05944
203	Kohn, Anita	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28501
204	Laderbush, Bonnie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-24258
205	LaFlesh, Tia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00976
206	Lampron, Sarah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02493
207	Larnerd, Jean	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-00933
208	LaRue, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31335
209	Lawler, Christine	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-29510
210	Lawson, Elaine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23274
211	Lawson, Linda Wade	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06573
212	Leder, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-29512
213	Lee, Myrle Ann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-09183
214	Lee, Rosia	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-29514
215	Leicester, Jennifer	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01040
216	Leith, Sherrie L.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-08079
217	Lembke, Elizabeth	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-28541
218	Lepley, Sharon	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28548
219	Licano, Sharon	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05199
220	Linder, Paula S.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-11087
221	Linnon, Marlene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13125
222	Littrell, Sharron	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05215
223	Lizotte, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22779
224	Long, Janice	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-30195
225	Long, Susan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01063
226	Loury, Jannae	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13293
227	Mack, Cathy	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04370
228	MacLeod, Renee	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10608
229	Maddock, Melissa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00184
230	Maestas, Cecilia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13668

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231	Maloney, Elaine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07117
232	Manczur, Billie dec'd	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:-13-01775
233	Manes, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28384
234	Marshall, Brianne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08091
235	Martin, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2;13-30197
236	Massoudi, Farah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13111
237	McCoy, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	NO.2:14-28536
238	McCracken, Cynthia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08268
239	McCumber, Betty	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-08083
240	McDaniel, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13301
241	McDaniel, Vickie L.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01267
242	McLaughlin, Shirley	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29126
243	McMichen, Theresa	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-301989
244	Meffert, Debbie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08098
245	Megee, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-27467
246	Meltsch, Cynthia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03037
247	Mercado, Jennifer	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12763
248	Metcalf, Debra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28533
249	Miller, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08553
250	Minor, Kristen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02394
251	Minzel, Carlene Jo	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08274
252	Mitchell, Nora	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08094
253	Monaco-Martin, Charlene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08110
254	Mongeon, Sheila	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00391
255	Monroe, Ruby	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05906
256	Montgomery, Cheilion	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05601
257	Moody, Carol	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-13110
258	Moore, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13404
259	Moore, Lynnyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22695
260	Morrow, Crystal	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31271
261	Moser, Susan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:16-01314
262	Moyer, Michelle	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-16177
263	Mullins, Ann Marie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04305
264	Mullins, Rosalee	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01642
265	Murn, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-22697
266	Nash, Marianne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11332
267	Nave, Brenda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-05127
268	Nelson, Erin	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-24262
269	Nero, Esther	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-24805
270	Newton, Mary Sue	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-11092
271	Nguyen, Thuy K.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31263
272	Nichols, Sherrilee Marchelle	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-31108
273	Nicklas, Donna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01241
274	Nix, Arlene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06574
275	Notter, Angela C.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03282
276	Nuckolls, Sandra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31817

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277	O'Malley, Leeann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-31812
278	Olavarria, Magdalena	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-00890
279	Oliveira Lervon R.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-09062
280	Ouchida, Lorraine	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-04087
281	Owen, Tabitha	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12--08316
282	Owens, Barbara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01206
283	Palmquist, Coreen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13669
284	Parker, Edith Maxine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03184
285	Patterson, Kaye	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08315
286	Pearson, Kristine	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29129
287	Perez-Lauzon-Suarez, Alisha	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29091
288	Pinaroc-Perez, Jeannette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00518
289	Poe, Kimberley	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2;15-04373
290	Pooley, Peggy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2-13-08270
291	Poore, Melody	West Virginia Southern District U.S.D.C.	Ethicon	No. 2;15-03182
292	Post, Denise	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07109
293	Priest, Carvel	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05597
294	Rambeau, Mary Katherine	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05842
295	Ream, Jane	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-32395
296	Redl, Anna L.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-03822
297	Reeves, Becky	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13672
298	Regino, Lisa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05220
299	Rihm, Nancy J.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00286
300	Riley, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-14626
301	Rodriguez, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23267
302	Roop, Favienne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07111
303	Rosa, Heyda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05911
304	Rosario-Zelfine, Luisa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08326
305	Rosier, Nancy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08323
306	Ross, Janice A.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01204
307	Ross, Laurel	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00691
308	Roundine, Laura	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-33420
309	Rowe, Brenda	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-26253
310	Ruf, Nancy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13302
311	Russell, Cathy A.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03305
312	Russell, Cynthia	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-28532
313	Rutherford, Stefanie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01066
314	Rutledge, Clara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07519
315	Rutledge, Deborah	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04304
316	Sanchez, Jacqueline	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-02146
317	Santana, Santa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-cv-07849
318	Santistevan, Mariquita	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02875
319	Sargentelli, Elizabeth	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-02150
320	Saxton, Bobbie Jean	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04274
321	Schnell, Dolores	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-33419
322	Schulte, Tamara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28515

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323	Sciumbata, Teresa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-cv-07037
324	Scott, Cassandra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-07849
325	Scott, Patti	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07113
326	Seabolt, Gloria K.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03807
327	Searl, Tamara	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00064
328	Seely, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-03281
329	Segrist, Sharron	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05202
330	Sellers, Jennifer	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-30849
331	Sevek, Penny	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04300
332	Shaffer, Brenda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07769
333	Shannon, Crystal	West Virginia Southern District U.S.D.C.	Ethicon	No. 14-29138
334	Sharp, Rebecca	West Virginia Southern District U.S.D.C.	Ethicon	No.2:15-00696
335	Sharp, Verenda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00062
336	Shelnutt, Beverley A.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-07248
337	Sheridan, Lori	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00288
338	Shoemaker, Donna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11907
339	Shoemaker, Doris	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-03038
340	Shook, Marie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13670
341	Shrive, Jane	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00060
342	Shriver, Michelyn	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01766
343	Shukowitsh, Jenny	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-28327
344	Sikes, Edna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01795
345	Silva, DeeAnne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00059
346	Silvia, Carolann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00058
347	Simpson, Nebra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00055
348	Simpson, Ramona	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-00051
349	Sine, Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-7842
350	Sinkovich, Brenda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01062
351	Sirko, Maryann	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01376
352	Slentz, Marietta	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08111
353	Slusher, Veronica	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10633
354	Smith, Clarice	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01377
355	Smith, Janeen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01378
356	Smith, Lessie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23560
357	Smith, Norma	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-11111
358	Smith, Sandra	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-00258
359	Smith, Tammie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-29558
360	Smith, Teresa R. dec'd	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-5305
361	Soles, Linda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08266
362	Sowers, Arnita	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23558
363	Spadafore, Donna	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-00890
364	Staigmilller, Marlene	West Virginia Southern District U.S.D.C.	Ethicon	No.14-28539
365	Statham, Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00661
366	Stephens, Vivian	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29127
367	Stevens, Carma	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01210
368	Stigen, Mary Ellen	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13307

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369	Stinnett, Roann	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:13-05938
370	Stone, Lois	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11911
371	Sutphin, Annette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01379
372	Swanson, Joanne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01380
373	Swint, Denise	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01681
374	Sylvester, Tracie	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-09047
375	Talkington, Rebecca	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-01033
376	Tarvin, Delores	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08271
377	Templin, Cherie Nunley	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10620
378	Teneyck, Terri	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-28546
379	Thibodeaux-Billodeaux, Dan	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01381
380	Thomas, Crystal	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-02536
381	Thomas, Lawanda	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-24259
382	Thomas, Sadie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-16174
383	Thompson, Cynthia E.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-02652
384	Thompson, Cynthia S.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-10656
385	Thompson, Joanna	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01382
386	Thompson, Karen	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05826
387	Thompson, Regina M.	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:12-09074
388	Thorne, Mary	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-01269
389	Tillman, Sebrena	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-08547
390	Tobin, Teresa	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29130
391	Toliver, Rosemary	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-00932
392	Trivett, Donna K.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-08259
393	Tucker, Tanzy	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05591
394	Tunsil, Pearl	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07083
395	Turcotte, Judith	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06229
396	Turner-Bagsby, Collette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06860
397	Turney-Mayeaux, Sherry	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-05598
398	Vaughn, Carrie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11666
399	Vazquez-Nitschneider, Laura	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-01680
400	Vides, Rina	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04400
401	Villagomez, Teresa	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-05914
402	Walker, Merel	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-01385
403	Walker, Patricia D.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-14351
404	Wallin, Patricia	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29136
405	Walz, Theresa	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:15-04396
406	Ward, Gloria	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-13120
407	Ward, Nanette	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07115
408	Washburn, Valera	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29096
409	Wasson, Yvonne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-30826
410	Waters, Paula	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13--09712
411	Watson, Agnes	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11330
412	Weaver, Robin	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01384
413	Wells, Stephanie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-06438
414	Wessel, Joyce	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-01383

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415	West, Lynne	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01678
416	Whalen, Connie D.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-cv-7839
417	Wheeler, Geraldine	West Virginia Southern District U.S.D.C.	Ethicon	NO. 14-29089
418	Whittlinger, Barbara June	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-07099
419	Wildfong, Darlene	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-01388
420	Williams, Elizabeth	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-06215
421	Williams, Nicole	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-16176
422	Williamson, Connie	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-11909
423	Wilson, Tiffany	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-12752
424	Wininger, Kathy	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-00284
425	Witherspoon, Tanya	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:14-cv-30856
426	Yetter, Jean M.	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:15-01599
427	Young, Carolyn	West Virginia Southern District U.S.D.C.	Ethicon	NO. 2:14-01387
428	Youngblood, Darlene	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:13-23550
429	Zwolinski, Loretta	West Virginia Southern District U.S.D.C.	Ethicon	No. 2:12-08317

Exhibit “B”

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

CHARLESTON DIVISION

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL No. 2327

THIS DOCUMENT RELATES TO ALL CASES

PRETRIAL ORDER # 12

(Master and Short Form Complaint and Master Responsive Pleadings; Direct Filing)

To eliminate the delays associated with the transfer of cases filed in or removed from other federal district courts to this court as part of MDL No. 2327, to promote efficiency and to accommodate plaintiffs who wish to bring claims against defendants in more than one pelvic repair system MDL, it is **ORDERED** as follows:

A. General.

(1) The attached Master Long Form Complaint and Jury Demand ("Master Complaint") against Ethicon, Inc. ("Ethicon"), Ethicon, LLC ("Ethicon, LLC") and Johnson & Johnson ("J&J"), the Short Form Complaint against Ethicon and others, and the defendants' Master Answers and Jury Demands ("Answers") have been presented to the court, and the court **DIRECTS** that the Clerk file the same.

(2) The court refers the parties to Exhibit A, "Filing Instructions for Short Form Complaint," which is appended to this Order.

(3) All factual allegations pled in the Master Complaint and all responses pled in Ethicon's, Ethicon, LLC's and J&J's Answers are deemed pled in any previously

filed Complaint and Responsive Pleading now pending in this MDL proceeding, and in any Short Form Complaint and Entry of Appearance hereafter filed; provided, however, the Master Complaint is applicable only as against Ethicon, Ethicon, LLC and J&J.

B. Directly Filed Cases.¹

(1) Subsequent to the filing of this Order, all actions filed directly in this MDL against the defendants named in the Master Complaint, Ethicon, Ethicon, LLC and J&J, shall be filed by the Short Form Complaint.

(2) Subsequent to the filing of this Order, if a plaintiff alleges she was implanted with products manufactured or marketed by defendants in more than one MDL (i.e., plaintiff was implanted with an Ethicon product and a product manufactured by a defendant named in a Master Long Form Complaint in MDL Nos. 2187, 2325 or 2326) and has claims against all such defendants, then the plaintiff may choose in which MDL to initially file. However, such a plaintiff must check off each applicable defendant on the Short Form Complaint.

(3) For those cases filed directly in MDL No. 2327 prior to the entry of this Order, plaintiff shall file the attached Short Form Complaint within 90 days of the entry of this Order so long as the plaintiff names only defendants named in the Master Complaint in this MDL (and any defendant(s) named in the Master Complaints in the three other MDLs cited above). If a plaintiff filed directly in this MDL prior to the entry of this Order and named defendants other than those named in Master Complaints in this or the other three MDLs assigned to the court, direct filing was

¹ A "Directly Filed Case" is a case filed in the Southern District of West Virginia for inclusion in this MDL, but the Southern District of West Virginia does not necessarily have personal jurisdiction over the parties.

inappropriate, and the plaintiff should either dismiss the inappropriately named defendants or dismiss the direct filed case without prejudice and pursue her claims in her home district with subsequent transfer through the MDL Panel.

- (4) This court shall not be deemed to be the “transferor court” simply by virtue of the action having been directly filed into MDL No. 2327. The direct filing of actions in MDL No. 2327 in the Southern District of West Virginia is solely for the purposes of consolidated discovery and related pretrial proceedings as provided by 28 U.S.C. § 1407 and, the parties submit to this court’s personal jurisdiction and venue in the Southern District for those purposes only. Upon completion of all pretrial proceedings applicable to a case directly filed in the Southern District, the defendants do not intend to waive their rights to transfer any case in this MDL to a court of proper venue under 28 U.S.C. § 1406(a). At the conclusion of all pretrial proceedings, the court, pursuant to 28 U.S.C. § 1404(a), will transfer each case filed directly in the Southern District to a federal district court of proper venue as defined in 28 U.S.C. § 1391, based on the recommendations of the parties to that case, or on its own determination after briefing from the parties if they cannot agree. In an effort to avoid serial objections to venue in a single action, plaintiff shall identify in response to a defendant’s venue objection, proposed alternative venues in order of preference, so that the court can consider at the same time, any objections to plaintiff’s alternative choices.

C. Cases Transferred by the Judicial Panel on Multidistrict Litigation ("MDL Panel").²

(1) For those cases transferred to MDL No. 2327 from another Federal District Court by the MDL Panel prior to the entry of this Order, plaintiffs who only named defendants named in Master Complaints in this or the other three MDLs assigned to the court shall file a Short Form Complaint within 90 days of the entry of this Order. For those cases transferred after the entry of this Order, any plaintiff as described above shall file a Short Form Complaint within 30 days of being assigned a member case number in MDL No. 2327. For those cases transferred to MDL No. 2327 by the MDL Panel before or after the entry of this order, wherein the plaintiff has named defendants named in Master Complaints in this or the other three MDLs AND additional defendant(s) other than those named in Master Complaints, the plaintiff need not file a Short Form Complaint.

(2) Upon completion of the pretrial proceedings relating to a civil action as determined by this court, civil actions in this MDL which were transferred to this court by the MDL Panel shall be transferred for further proceedings to the District Court from which such action was transferred to this MDL.

D. All Cases.

(1) If a plaintiff files a Short Form Complaint in compliance with this Order that omits a defendant previously named in the prior complaint, it is the responsibility of that plaintiff to dismiss that defendant in compliance with Rule 41 of the Federal Rules of Civil Procedure. The court strongly encourages dismissal by notice or stipulation where permitted by Rule 41(a)(1)(A)(i) or (ii), rather than by court order. If a

² A "Case Transferred by the MDL Panel" is a case filed in a district other than the Southern District of West Virginia and subsequently transferred to the Southern District by the MDL Panel.

plaintiff names an additional defendant not named in the prior complaint, the plaintiff must comply with Rule 4 as to the new defendant. To the extent any change in parties suggests that the case should be in a different MDL, a Short Form Complaint should be accompanied by a motion to transfer MDLs with a proposed order.

(2) Each Short Form Complaint shall indicate those counts in the Master Complaint that are being asserted in the individual case and the specific consumer protection statute, if any, upon which the plaintiff relies.

(3) The defendants named in the Master Complaint against Ethicon, Ethicon, LLC and J&J are not required to file answers to Short Form Complaints. An Entry of Appearance (including an appearance entered prior to the filing of the Short Form Complaint) by an attorney representing such defendants shall constitute a denial of all allegations in the Short Form Complaint filed against any of the defendants named in the Master Complaint and an assertion of all defenses that are included in the Answers of Ethicon, Ethicon, LLC and J&J.

(4) If a defendant in MDL Nos. 2187, 2325 or 2326 is named in a case in this MDL, an Entry of Appearance (including an appearance entered prior to the filing of the Short Form Complaint) by an attorney representing such a defendant shall constitute a denial of all allegations in the Short Form Complaint filed against any such defendant. In addition, the Master Responsive Pleading filed by that defendant in its designated MDL is deemed to be filed in that particular case.

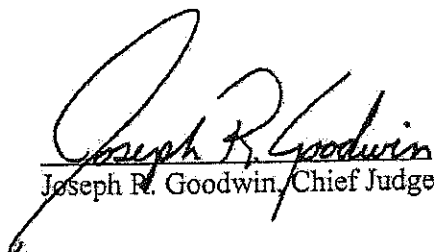
(5) Upon agreement of the parties, given the large number of Complaints being filed, plaintiffs' counsel will meet and confer with defendants' counsel to advise defendants

before implementing any default procedures, and will provide defendants ten business days in which to cure any alleged default.

- (6) Defendants shall have 30 days from the entry of this Order to file any motion asserting that the Master Complaint fails to state a claim upon which relief may be granted, pursuant to Rule 12(b)(6), and plaintiffs shall have 20 days thereafter to respond to the same.

The court **DIRECTS** the Clerk to file a copy of this order in 2-12-md-2327 and it shall apply to each member related case previously transferred to, removed to, or filed in this district, which includes counsel in all member cases up to and including civil action number 2-12-cv-4498. In cases subsequently filed in this district, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action at the time of filing of the complaint. In cases subsequently removed or transferred to this court, a copy of the most recent pretrial order will be provided by the Clerk to counsel appearing in each new action upon removal or transfer. It shall be the responsibility of the parties to review and abide by all pretrial orders previously entered by the court. The orders may be accessed through the CM/ECF system or the court's website at www.wvsc.uscourts.gov.

ENTER: August 22, 2012


Joseph R. Goodwin, Chief Judge